

**Lower Willamette Group**

**Co-Chairperson: Bob Wyatt, NW Natural**  
**Co-Chairperson: Jim McKenna, Port of Portland**

April 10, 2006

***VIA ELECTRONIC TRANSMISSION***

Mr. Robin Plance, chair  
Portland Harbor Community Advisory Group

Ms. Jane Haley-Harris, executive director  
Oregon Center for Environmental Health

Dear Robin and Jane:

On behalf of the Lower Willamette Group (LWG) we were pleased to hear of plans for a Community Advisory Group (CAG) sponsored Portland seminar on the potential for the use of alternative and innovative remedial technologies at the Portland Harbor Superfund Site. The LWG is requesting to be included in the program for this important event.

The evaluation of remedial technologies is a very important part of the Superfund process and is required by our Administrative Order on Consent (AOC) and Statement of Work (SOW) during the remedial investigation and feasibility study (RI/FS). Specifically, the LWG is required to identify, screen and document remedial technologies for every proposed action at the site. This process starts with a comprehensive review of available remedial technologies, both innovative, and more standard, which will be used to build comprehensive remedial alternatives for the site. We must apply nine evaluation criteria to each action. These are:

1. Overall protection of human health and the environment
2. Compliance with applicable or relevant and appropriate requirements (ARARs) – these are the site specific cleanup standards
3. Long-term effectiveness and permanence
4. Reduction of toxicity, mobility or volume
5. Short-term effectiveness
6. Implementability
7. Costs
8. State (or support agency) acceptance
9. Community acceptance

As with many other important technological studies at this site, the LWG is being proactive in our approach to this phase of our work. We have laid the framework for development and evaluation of remedial technologies in the project Programmatic Work Plan and are carrying out the steps to complete the Feasibility Study, including a detailed review of innovative treatment technologies, which we will be presenting to EPA this year. We believe we can add value to this program by offering an initial overview of that approach as a part of the seminar's program.

Our review of innovative technologies to date (which will be further evaluated through to the Feasibility Study) has included:

**Treatment Technologies Review and Development**

- Passive Dewatering
- Mechanical Dewatering
- Reagent Enhancement
- Particle Separation
- Blending with Amendments
- Stabilization/Solidification (in-situ and ex-situ)
- Sediment Washing
- Chemical Extraction
- Chemical Oxidation
- Dehalogenation
- Incineration

- Pyrolysis
- Thermal Desorption
- Vitrification (in-situ and ex-situ)
- Enhanced Bioremediation
- Phytoremediation
- Chemical Oxidation
- Electrochemical Remediation

**Other Innovative Technologies**

- Reactive Capping
- Precision Dredging
- Enhanced Natural Recovery
- Thin-layer capping
- Advanced dredging containment options

We believe providing a review of our continuing work at the seminar will help the audience as it considers this important issue. In addition to LWG managers and consultants we know of several third-party experts at other agencies and educational institutions who could also provide valuable insight on this subject.

We look forward to working with the CAG on this important issue and the many other challenges we face at the Portland Harbor Superfund Site. Please contact Barbara Smith to further discuss how the LWG many be involved in this event.

Sincerely,

  
Bob Wyatt  
Co-Chair

  
Jim McKenna  
Co-Chair

cc: Chip Humphrey, EPA  
Judy Smith, EPA  
Jim Anderson, DEQ  
Mikell O'Mealy, DEQ  
NEBC